

1 THOMAS A. COLTHURST (CABN 99493)
Attorney for the United States

2 KATHERINE WAWRZYNIAK (CABN 252751)
3 Chief, Criminal Division

4 DAVID J. WARD (CABN 239504)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7200
8 FAX: (415) 436-7230
david.ward@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12
13

14 UNITED STATES OF AMERICA,)	NO. CR 21-00192 WHO
)	
15 Plaintiff,)	MOTION TO UNSEAL
)	
16 v.)	
)	
17 WILLIAM GILMARTIN, III,)	
)	
18 Defendant.)	
)	

19
20 On May 27, 2021, defendant William GILMARTIN pled guilty before this Court to a one-count
21 Information charging him with Conspiracy to Commit Honest Services Wire Fraud. *Dkt 39, 40*. At the
22 request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea,
23 was filed under seal because at the time the government's investigation of the facts underlying defendant
24 GILMARTIN's conduct was ongoing. There is no longer an investigative need by the government to
25 keep defendant GILMARTIN's factual admissions in Exhibit A under seal. The undersigned Assistant
26 U.S. Attorney consulted with counsel for defendant GILMARTIN, who has no objection to unsealing
27 Exhibit A to the Plea Agreement.

28 //

MOTION TO UNSEAL/PROPOSED ORDER 1
CR 21-00192 WHO

1 Therefore, the government respectfully requests that this Court order that Exhibit A to defendant
2 GILMARTIN's plea agreement be unsealed.

3
4
5 THOMAS A. COLTHURST
6 Attorney for the United States

7
8 Dated: June 7, 2023

/s/ David J. Ward
9 DAVID J. WARD
 Assistant United States Attorney

10 For good cause shown, it is **SO ORDERED**.

11
12 Dated: _____

13 HONORABLE WILLIAM H. ORRICK
14 United States District Court Judge